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Of Attorneys for Defendants
Port of Portland, Thomas T. Ko,
Jeremy Hepp, Jacob Cassity, and
Jerry Saldivar

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

HOWARD GROBSTEIN, as Chapter 7
Bankruptcy Trustee for, **BLANCA**
AGUIRRE,

Plaintiff,

v.

PORT OF PORTLAND, a Municipal
Corporation, **THOMAS T. KO**, an individual,
JEREMY HEPP, an individual, **JACOB**
CASSITY, an individual, **JERRY**
SALDIVAR, an individual, **POLLIN**
HOTELS II, LLC, an Oregon limited liability
company, doing business as **SHERATON**
PORTLAND AIRPORT HOTEL,
STARWOOD HOTELS & RESORTS
WORLDWIDE, LLC, a foreign limited
liability company and **CANTERBURY**
HOTEL GROUP, an Oregon company, doing
business as **FOUR POINTS BY SHERATON**
PORTLAND EAST,

Defendants.

Case No. 3:18-cv-01916-HZ

DEFENDANT PORT OF PORTLAND,
THOMAS T. KO, JEREMY HEPP,
JACOB CASSITY AND JERRY
SALDIVAR'S UNOPPOSED MOTION
TO EXTEND PRETRIAL FILING
DEADLINES

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7-1, I hereby certify that I have conferred with opposing counsel and counsel for co-defendants regarding this request for an extension and they consent.

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MOTION

Pursuant to Fed R Civ P 6(b), defendants Port of Portland, Thomas T. Ko, Jeremy Hepp, Jacob Cassity, and Jerry Saldivar (herein the “Port defendants”) respectfully move the Court for its order extending the current pretrial filing deadlines [Docket #64] as follows:

First Wave of Documents: March 14, 2022 extended to March 21, 2022;

Second Wave of Documents: March 21, 2022 extended to March 25, 2022;

Third Wave of Documents: March 28, 2022 extended to March 31, 2022;

Fourth Wave of Documents: remains the same – April 8, 2022.

The reason for this request is that the parties are currently engaged in further settlement negotiations.

DATED: March 7, 2022.

VICKERS PLASS LLC

s/ Beth F. Plass

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